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8 CHURCHILL COUNTY AND
9 BENJAMIN TROTTER

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL ERWINE,

Plaintiff,

vs.

CHURCHILL COUNTY, a political subdivision
of the State of Nevada; CHURCHILL COUNTY
SHERIFF BENJAMIN TROTTER; and DOES 1
through 10 inclusive,

Defendants.

CASE NO. 3:18-cv-00461-RCJ-CSD

DEFENDANTS' PROPOSED VOIR
DIRE QUESTIONS

COME NOW Defendants, CHURCHILL COUNTY and BENJAMIN TROTTER, by and
through their attorneys of record, Thorndal Armstrong Delk Balkenbush & Eisinger, and
pursuant to the Court's Amended Order Regarding Trial (Doc. #143) hereby submit their
proposed voir dire questions.

1. Have you, or a member of your family, ever been employed in the field of law enforcement?
2. Have you, or a member of your family, ever been employed by Churchill County?
3. Have you, or a member of your family, ever been a plaintiff or defendant in a wrongful termination lawsuit? If yes, please describe the nature of the lawsuit and how it was

1 resolved.

2 4. Have you, or a member of your family, ever been a party in any other type of civil
3 lawsuit?

4 5. Are you currently employed? If yes, who is your employer?

5 6. Is your spouse or significant other employed? If yes, who is their employer?

6 7. Have you or a member of your family ever served on a jury before? If yes, please
7 explain who served on the jury and briefly describe the nature of the case. In addition, please
8 state whether your prior jury experience left you with any adverse feelings towards the jury
9 system.
10

11 8. Have you heard or read anything about this case prior to being called as a juror,
12 including, but not limited to, any newspaper articles referencing Michael Erwine, Ben Trotter or
13 the Churchill County Sheriff's Office? If yes, please explain how you acquired such
14 information.
15

16 9. Have you seen or read any social media posts which reference Michael Erwine or
17 Ben Trotter? If yes, briefly describe the nature of those social media posts.
18

19 10. Do you know any of the other prospective jurors? If yes, please identify any juror
20 whom you know.

21 11. Do you know any of the facts of this case? If yes, please explain.

22 12. Do you have any adverse feelings towards those employed in the field of law
23 enforcement generally which you believe would impact your ability to be an impartial juror in
24 this case? If yes, please briefly explain the basis for those feelings.
25

26 13. Have you, or a member of your family, ever applied for a job in law enforcement
27 and not been hired? If yes, please explain.
28

1 14. Are you related by blood or marriage to any of the parties to this action, their
2 attorneys, or any person whom you have reason to believe may be a witness in this action? If
3 yes, please describe the nature of your relationship.

4 DATED this 10th day of February, 2022.

5
6 THORNDAL ARMSTRONG
7 DELK BALKENBUSH & EISINGER

8 By: Katherine F. Parks

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17 Benjamin Trotter
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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of THORNDAL ARMSTRONG DELK BALKENBUSH & EISINGER, and that on this date I caused the foregoing **DEFENDANTS'**

PROPOSED VOIR DIRE QUESTIONS to be served on all parties to this action by:

_____ placing an original or true copy thereof in a sealed, postage prepaid, envelope in the United States mail at Reno, Nevada.

☒ United States District Court, District of Nevada CM/ ECF (Electronic Case Filing)

_____ personal delivery


_____ facsimile (fax)

_____ Federal Express/UPS or other overnight delivery

fully addressed as follows:

Luke Busby, Esq.
316 California Ave., #82
Reno, NV 89509
Attorney for Plaintiff

DATED this 10 day of February, 2022.



An employee of THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER